

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF GEORGIA  
ROME DIVISION

IN RE: MICHAEL SHANNON ARP,	{	CHAPTER 13
	{	
	{	
DEBTOR(S)	{	CASE NO. R20-40924-PWB
	{	
	{	JUDGE BONAPFEL

**OBJECTION TO CONFIRMATION**

COMES NOW Mary Ida Townson, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The voluntary petition fails to reflect the Debtor's name of Michael Shane Arp.
3. Due to a change in circumstances since filing, Schedules I and J do not correctly reflect the current financial situation, thereby preventing the Trustee from evaluating feasibility, 11 U.S.C. Section 1325(a)(6); specifically, the Debtor no longer receives insurance allowance of \$187.00 per month.

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

June 17, 2020

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/s  
Mary Ida Townson, Esq.  
Chapter 13 Trustee  
GA Bar No. 715063

R20-40924-PWB

**CERTIFICATE OF SERVICE**

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

MICHAEL SHANNON ARP  
3301 GARDEN LAKES PKWY  
APT 25A  
ROME, GA 30165

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

JEFFREY B. KELLY, ESQ

This 17<sup>th</sup> day of June, 2020

\_\_\_\_\_  
/s/

Mary Ida Townson  
Standing Chapter 13 Trustee  
GA Bar No. 715063

Mary Ida Townson, Chapter 13 Trustee  
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